

**U.S. District Court**  
**United States District Court for the Western District of Washington (Seattle)**  
**CIVIL DOCKET FOR CASE #: 2:18-cv-01789-RSM**

Moujtahid et al v. United States Citizenship and Immigration Services et al  
Assigned to: Judge Ricardo S. Martinez  
Cause: 05:552 Freedom of Information Act

Date Filed: 12/12/2018  
Jury Demand: None  
Nature of Suit: 895 Freedom of Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff**

**Fatima Moujtahid**  
*on behalf of herself and her minor child*

represented by **Jay W Gairson**  
GAIRSON LAW  
4606 MARTIN LUTHER KING JR WAY S  
SEATTLE, WA 98108  
206-357-4218  
Email: jay@gairson.com  
**ATTORNEY TO BE NOTICED**

**Plaintiff**

**BM**

represented by **Jay W Gairson**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

**Plaintiff**

**Jay Gairson**  
*in his professional capacity as the requester on behalf of his clients Fatima Moujtahid and BM*

represented by **Jay W Gairson**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

V.

**Defendant**

**US Citizenship and Immigration Services**  
*("USCIS")*

represented by **Michelle R. Lambert**  
US ATTORNEY'S OFFICE (TACOMA)  
1201 PACIFIC AVE  
STE 700  
TACOMA, WA 98402  
253-428-3824  
Email: michelle.lambert@usdoj.gov  
**ATTORNEY TO BE NOTICED**

**Defendant**

**United States Department of Homeland Security**  
*("DHS")*

represented by **Michelle R. Lambert**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

**Defendant**

**National Records Center**  
*("NRC")*

represented by **Michelle R. Lambert**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

**Defendant**

**Kirstjen Nielsen**  
*in her official capacity as Secretary of the DHS*

represented by **Michelle R. Lambert**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

**Defendant**

**L Francis Cissna**  
*in his official capacity as Director of USCIS*

represented by **Michelle R. Lambert**  
(See above for address)  
**ATTORNEY TO BE NOTICED**

**Defendant****Jill A Eggleston**

in her official capacity as the USCIS and NRC  
FOIA/PA Public Liaison

represented by **Michelle R. Lambert**

(See above for address)

**ATTORNEY TO BE NOTICED**

Date Filed	#	Docket Text
12/12/2018	<a href="#">1</a>	<b>SEALED DOCUMENTS</b> COMPLAINT <i>for declaratory relief and injunctive relief for violation of the Freedom Of Information Act</i> against All Defendants (Receipt # 0981-5579068) Attorney Jay W. Gairson added to party Jay Gairson(pty:pla), Attorney Jay W. Gairson added to party BM (pty:pla), Attorney Jay W. Gairson added to party Fatima Moujtahid(pty:pla), filed by Jay Gairson, BM, Fatima Moujtahid. (Attachments: # <a href="#">1</a> Civil Cover Sheet, # <a href="#">2</a> Summons, # <a href="#">3</a> Exhibit Declaration of Jay Gairson and Exhibits to Complaint)(Gairson, Jay) Modified on 12/17/2018 (KB). (Entered: 12/12/2018)
12/12/2018	<a href="#">2</a>	<b>SEALED DOCUMENT</b> PRAECIPE TO ISSUE SUMMONS re <a href="#">1</a> Complaint,, <i>Summons of US Attorney</i> by Plaintiffs Jay Gairson, BM, Fatima Moujtahid (Gairson, Jay) Modified on 12/17/2018 (KB). (Entered: 12/12/2018)
12/13/2018		Judge Ricardo S. Martinez added. (SNP) (Entered: 12/13/2018)
12/13/2018	<a href="#">3</a>	NOTICE TO FILER: re <a href="#">1</a> Complaint,, <b>Notice of Filing Deficiency</b> ** Action Required ** See Attached Letter for More Information and Instructions. (SNP) (Entered: 12/13/2018)
12/13/2018	<a href="#">4</a>	<b>SEALED DOCUMENT</b> Summons(es) Electronically Issued as to defendant(s) All Defendants (Attachments: # <a href="#">1</a> Summons)(SNP) Modified on 12/17/2018 (KB). (Entered: 12/13/2018)
12/13/2018	<a href="#">5</a>	<b>SEALED DOCUMENT</b> REDACTION to <a href="#">1</a> Complaint, <i>Declaration of Jay Gairson and Exhibits to Complaint</i> by Plaintiffs Jay Gairson, BM, Fatima Moujtahid (Gairson, Jay) Modified on 12/17/2018 (KB). (Entered: 12/13/2018)
12/13/2018	<a href="#">6</a>	PRAECIPE TO ISSUE SUMMONS re <a href="#">1</a> Complaint by Plaintiffs Jay Gairson, BM, Fatima Moujtahid <b>SEALED DOCUMENTS</b> (Attachments: # <a href="#">1</a> Summons of USDHS, # <a href="#">2</a> Summons of NRC, # <a href="#">3</a> Summons of Nielsen, # <a href="#">4</a> Summons of Eggleston, # <a href="#">5</a> Summons of Cissna)(Gairson, Jay) Modified on 12/17/2018 (KB). (Entered: 12/13/2018)
12/14/2018	<a href="#">7</a>	<b>SEALED DOCUMENT</b> Summons(es) Electronically Issued as to defendant(s) All Defendants (Attachments: # <a href="#">1</a> Summons, # <a href="#">2</a> Summons, # <a href="#">3</a> Summons, # <a href="#">4</a> Summons)(SNP) Modified on 12/17/2018 - sealed summons as they contain minor child's full name (KB). (Entered: 12/14/2018)
12/14/2018	<a href="#">8</a>	<b>SEALED DOCUMENT</b> Summons Electronically Issued as to defendant United States Department of Homeland Security (main document) (Attachments: # <a href="#">1</a> Summons - National Records Center, # <a href="#">2</a> Summons - Kirstjen Nielsen, # <a href="#">3</a> Summons - L Francis Cissna, # <a href="#">4</a> Summons - Jill A Eggleston) (PM) Modified on 12/17/2018 - sealed summons as they contain minor child's full name (KB). (Entered: 12/14/2018)
12/17/2018	<a href="#">9</a>	NOTICE TO FILER: re <a href="#">1</a> Complaint,, <b>Notice of Filing Deficiency</b> ** Action Required ** See Attached Letter for More Information and Instructions. (SNP) (Entered: 12/17/2018)
12/17/2018	<a href="#">10</a>	REDACTION to <a href="#">1</a> Complaint,, by Plaintiffs BM, Jay Gairson, Fatima Moujtahid (Attachments: # <a href="#">1</a> Civil Cover Sheet Redacted Civil Cover Sheet, # <a href="#">2</a> Exhibit Redacted Exhibits)(Gairson, Jay) (Entered: 12/17/2018)
01/03/2019	<a href="#">11</a>	ORDER REGARDING INITIAL DISCLOSURES AND JOINT STATUS REPORT Joint Status Report due by 2/14/2019, FRCP 26f Conference Deadline is 1/31/2019, Initial Disclosure Deadline is 2/7/2019, by Judge Ricardo S. Martinez. (LW) (Entered: 01/03/2019)
01/15/2019	<a href="#">12</a>	NOTICE of Appearance by attorney Michelle R. Lambert on behalf of Defendants L Francis Cissna, Jill A Eggleston, National Records Center, Kirstjen Nielsen, United States Citizenship and Immigration Services, United States Department of Homeland Security. (Lambert, Michelle) (Entered: 01/15/2019)
01/15/2019	<a href="#">13</a>	MOTION to Stay re <a href="#">11</a> Joint Status Report Order Form for District Judges, <a href="#">1</a> Complaint,, <i>Deadlines</i> , filed by Defendants L Francis Cissna, Jill A Eggleston, National Records Center, Kirstjen Nielsen, United States Citizenship and Immigration Services. (Attachments: # <a href="#">1</a> Proposed Order) Noting Date 1/25/2019, (Lambert, Michelle) (Entered: 01/15/2019)

01/15/2019	<a href="#">14</a>	Stipulated MOTION <i>to Extend Time to Respond to Complaint</i> , filed by Defendants L Francis Cissna, Jill A Eggleston, National Records Center, Kirstjen Nielsen, United States Citizenship and Immigration Services. Noting Date 1/15/2019, (Lambert, Michelle) (Entered: 01/15/2019)
01/17/2019	<a href="#">15</a>	ORDER granting parties' <a href="#">14</a> Stipulated Motion for Extension of Time. Defendants' time to respond to the Complaint is extended to 2/4/2019. Signed by Judge Ricardo S. Martinez. (PM) (Entered: 01/17/2019)
01/23/2019	<a href="#">16</a>	RESPONSE, by Plaintiffs BM, Jay Gairson, Fatima Moujtahid, to <a href="#">13</a> MOTION to Stay re <a href="#">11</a> Joint Status Report Order Form for District Judges, <a href="#">1</a> Complaint,, <i>Deadlines</i> . (Attachments: # <a href="#">1</a> Proposed Order denying Motion for Stay)(Gairson, Jay) (Entered: 01/23/2019)
01/24/2019	<a href="#">17</a>	REPLY, filed by Defendants L Francis Cissna, Jill A Eggleston, National Records Center, Kirstjen Nielsen, US Citizenship and Immigration Services, United States Department of Homeland Security, TO RESPONSE to <a href="#">13</a> MOTION to Stay re <a href="#">11</a> Joint Status Report Order Form for District Judges, <a href="#">1</a> Complaint,, <i>Deadlines</i> (Lambert, Michelle) (Entered: 01/24/2019)
01/24/2019	<a href="#">18</a>	ORDER granting Defendants' <a href="#">13</a> Motion for a Stay of Deadlines in Light of Lapse of Appropriations. All pending deadlines, including the deadline to answer the complaint, are hereby STAYED and are hereby EXTENDED commensurate with the duration of the lapse in appropriations. Signed by Judge Ricardo S. Martinez. (PM) (Entered: 01/24/2019)
01/29/2019	<a href="#">19</a>	NOTICE <i>of Appropriation Rec'd and PO re resetting deadlines</i> ; filed by Defendants L Francis Cissna, Jill A Eggleston, National Records Center, Kirstjen Nielsen, US Citizenship and Immigration Services, United States Department of Homeland Security. (Lambert, Michelle) (Entered: 01/29/2019)
01/31/2019	<a href="#">20</a>	ORDER LIFTING STAY. The parties shall comply with the following deadlines: Deadline for Defendants to Respond to the Complaint is 2/4/2019, FRCP 26f Conference Deadline is 2/19/2019, Initial Disclosure Deadline is 2/26/2019, Joint Status Report due by 3/2/2019. Signed by Judge Ricardo S. Martinez. (TH) (Entered: 01/31/2019)
02/04/2019	<a href="#">21</a>	ANSWER to <a href="#">1</a> Complaint,, by L Francis Cissna, Jill A Eggleston, National Records Center, Kirstjen Nielsen, US Citizenship and Immigration Services, United States Department of Homeland Security. (Lambert, Michelle) (Entered: 02/04/2019)
03/01/2019	<a href="#">22</a>	STIPULATION AND PROPOSED ORDER <i>for relief from initial discovery deadline and JSR</i> by parties (Lambert, Michelle) (Entered: 03/01/2019)
03/05/2019	<a href="#">23</a>	ORDER releasing parties from the initial disclosure requirements of Rule 26(a)(1), as well as the requirements of Rule 26(f), requiring the parties to prepare a discovery plan per <a href="#">22</a> Stipulation. Joint Status Report due by 4/29/2019. Signed by Judge Ricardo S. Martinez. (PM) (Entered: 03/05/2019)
04/25/2019	<a href="#">24</a>	Joint STATUS REPORT by Defendants L Francis Cissna, Jill A Eggleston, National Records Center, Kirstjen Nielsen, US Citizenship and Immigration Services (Lambert, Michelle) (Entered: 04/25/2019)
04/29/2019	<a href="#">25</a>	ORDER re parties' <a href="#">24</a> Joint Status Report. Joint Status Report due by 6/28/2019. Signed by Judge Ricardo S. Martinez. (PM) (Entered: 04/29/2019)